UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

MARIA STAPLETON, et al on behalf of themselves, individually, and on behalf of all others similarly situated, and on behalf of the advocate plan,

Civil Action No. 1:14-cv-01873

Plaintiff,

v.

ADVOCATE HEALTH CARE NETWORK AND SUBSIDIARIES, ET AL.,

Defendants.

JOINT MOTION TO EXTEND DEADLINE FOR FILING MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Plaintiffs and Defendants, by and through their undersigned counsel, move to extend for one week, from February 9, 2018 to February 16, 2018, the time for Plaintiffs to file their motion to approve the settlement in this matter. In support of their Joint Motion, the parties state as follows:

- 1. On January 12, 2018, Plaintiffs and Defendants filed a Joint Status Report advising the Court that the parties had executed a term sheet for the settlement of this matter, estimating that a final settlement agreement would be executed by February 2, 2018, and that Plaintiffs would file an unopposed motion to for preliminary approval of the settlement by February 9, 2018. ECF No. 148.
- 2. The parties have been negotiating the form of settlement agreement in good faith, but have been unable to meet their estimated timeline. The parties believe that they will execute a final settlement agreement by Friday, February 9, 2018, and that Plaintiffs will be able to file their motion for preliminary approval on or before Friday, February 16, 2018.

- 3. An extension of one week, to February 16, 2018, in which to file Plaintiffs' motion for preliminary approval will not affect any deadlines or hearings in this matter.
- 4. This Motion is made in good faith and not made for purposes of hindrance or undue delay.

WHEREFORE, Plaintiffs and Defendants respectfully request this Court order that the time for Plaintiffs to file their motion for preliminary approval of their settlement be extended from February 9, 2018, through and including February 16, 2018, and for any such other and further relief as this Court deems just and proper.

Dated: February 6, 2018

Respectfully submitted,

| KELLER ROHRBACK, L.L.P. | GREENSFELDER, HEMKER & GALE, P.C. |
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| By /s/ Ron Kilgard Ron Kilgard rkilgard@kellerrohrback.com Christopher Graver cgraver@kellerrohrback.com 3101 North Central Avenue, Suite 1400 Phoenix, AZ 85012 Tel.: 602-248-0088 Fax: 602-248-2822 Attorneys for Plaintiffs | By /s/ Amy L. Blaisdell Amy L. Blaisdell, No. 6276380 apb@greensfelder.com Daniel J. Schwartz, No. 26202 djs@greensfelder.com Heather M. Mehta, No. 6308011 hmm@greensfelder.com 10 South Broadway, Suite 2000 St. Louis, Missouri 63102 Telephone: 314-241-9090 Facsimile: 314-345-4792 Attorneys for Defendants |
| KELLER ROHRBACK, L.L.P. Lynn Lincoln Sarko lsarko@kellerrohrback.com Erin M. Riley eriley@kellerrohrback.com 1201 Third Avenue, Suite 3200 Seattle, Washington 98101-3052 Tel.: 206-623-1900 Fax: 206-623-3384 Attorneys for Plaintiffs | GREENSFELDER, HEMKER & GALE, P.C. David B. Goodman, No. 6201242 dbg@greensfelder.com Courtney Adair, No. 6298188 cadair@greensfelder.com 200 West Madison Street, Suite 3300 Chicago, IL 60606 Telephone: 312-345-5008 Facsimile: 312-241-8624 Attorneys for Defendants |

| COHEN MILSTEIN SELLERS | |
|---------------------------------|--|
| & TOLL, PLLC | |
| Karen L. Handorf | |
| khandorf@cohenmilstein.com | |
| Michelle Yau | |
| myau@cohenmilstein.com | |
| Mary Bortscheller | |
| mbortscheller@cohenmilstein.com | |
| 1100 New York Avenue, N.W. | |
| Suite 500, West Tower | |
| Washington, D.C. 20005 | |
| Tel.: 202-408-4600 | |
| Fax: 202-408-4699 | |
| Attorneys for Plaintiffs | |
| | |
| STEPHAN ZOURAS, LLP | |
| James B. Zouras | |
| jzouras@stephanzouras.com | |
| Ryan F. Stephan | |
| rstephan@stephanzouras.com | |
| 205 North Michigan Avenue, | |
| Suite 2560 | |
| Chicago, Illinois 60601 | |
| Tel.: 312-233-1550 | |
| Fax: 312-233-1560 | |
| Attorneys for Plaintiffs | |
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